

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 01 - 152
	:	
v.	:	DATE FILED: _____
	:	
VINCENT WILLIAMS,	:	VIOLATION: 18 U.S.C. § 371 (Conspiracy to make false
a/k/a "Tate,"	:	statements to federal firearms licensee - 1 count);
a/k/a "Taterhead,"	:	18 U.S.C. § 924(a)(1)(A) (Making false statements to
BRIAN ROGERS,	:	federal firearms licensee - 6 counts);
a/k/a "B,"	:	18 U.S.C. § 1512(a)(1)(A) (Tampering with a witness by
JAMAIN WILLIAMS,	:	murder - 1 count);
a/k/a Jarmaine,"	:	18 U.S.C. § 1513(a)(1)(B) (Retaliation against a witness -
a/k/a "Jay,"	:	1 count);
a/k/a "Maine,"	:	18 U.S.C. § 924(c) (Using and carrying a firearm during
ANDRE COOPER,	:	and in relation to a crime of violence or drug trafficking
a/k/a "Dre,"	:	crime - 4 counts);
MARK ROGERS,	:	18 U.S.C. § 1962(c) (Participation in the affairs of an
a/k/a "Black Mark,"	:	interstate enterprise through a pattern of racketeering
SHANE TAYLOR,	:	activity (RICO) - 1 count);
RASHEE GRANT,	:	18 U.S.C. § 1959(a)(1) (Murder in aid of racketeering
a/k/a "Bae-Bae,"	:	activity - 2 counts);
DAMIR ROBERTS,	:	18 U.S.C. § 1512(b)(1) and (2) (Tampering with a
a/k/a "Dams"	:	witness - 1 count);
GEORGE DORSEY, and	:	21 U.S.C. § 846 (Conspiracy to distribute cocaine - 1
CHARLENE RESTUCCI	:	count);
	:	21 U.S.C. § 856 (Maintaining a house for the storage and
	:	distribution of a controlled substance - 1 count);
	:	21 U.S.C. § 841(a)(1) (Distribution of and possession with
	:	the intent to distribute cocaine - 16 counts);
	:	18 U.S.C. § 2 (Aiding and abetting);
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this Indictment:

1. Pursuant to Title 18, United States Code, Section 924(a)(1)(A), it is a criminal offense to knowingly make any false statement or representation with respect to the information required to be kept in the records of a person licensed under Chapter 44 of Title 18, United States Code (Sections 921-929).

2. Persons licensed under Title 18, United States Code, Chapter 44, included federal firearms licensees (“FFL”) licensed by the Bureau of Alcohol, Tobacco and Firearms (“ATF”) of the United States Department of the Treasury and doing business within the Eastern District of Pennsylvania and elsewhere.

3. Miller’s Sporting Goods (“Miller’s”), located at 1578 B Chichester Avenue, Linwood, Pennsylvania, was a federally licensed firearms dealer.

4. Ken Crane Sporting Goods (“Crane’s”), located at 310 Sloan Street, Crum Lynne, Pennsylvania, was a federally licensed firearms dealer.

5. FFL dealers were licensed, among other things, to sell firearms and ammunition. Various rules and regulations contained in and promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929) govern the manner in which an FFL may sell firearms and ammunition.

6. The rules and regulations governing FFL holders required that a person seeking to purchase a firearm fill out a “Firearms Transaction Record,” ATF Form 4473. Part of Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or

she is the actual buyer of the firearm, rather than a “straw purchaser” acquiring the firearm on behalf of another. The Form 4473 in effect at the times relevant to this Indictment contained language explaining what it means to be an actual buyer:

WARNING - The Federal firearms laws require that the individual filling out this form must be buying the firearm for himself or herself or as a gift. Any individual who is not buying the firearm for himself or herself or as a gift, but who completes this form, violates the law. Example: Mr. Smith asks Mr. Jones to purchase a firearm for Mr. Smith. Mr. Smith gives Mr. Jones the money for the firearm. If Mr. Jones fills out this form, he will violate the law. However, if Mr. Jones buys a firearm with his own money to give to Mr. Smith as a birthday present, Mr. Jones may lawfully complete this form. A licensee who knowingly delivers a firearm to an individual who is not buying the firearm for himself or herself or as a gift violates the law by maintaining a false ATF F 4473.

7. FFL holders were required, pursuant to regulations promulgated by ATF under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929), to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL, including the buyer’s home address and date of birth.

8. From on or about August 12, 2000 through on or about September 19, 2000 at Linwood, Crum Lynne and Chester, in the Eastern District of Pennsylvania, the defendant

VINCENT WILLIAMS,
a/k/a “Tate,”
a/k/a “Taterhead,”

conspired and agreed with Tracey Saunders and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to violate Title 18, United States Code, Section 924(a)(1)(A), by knowingly making false statements and representations concerning information required to be kept by a federally licensed firearms dealer, that is, the identity of the actual buyer of firearms.

MANNER AND MEANS OF THE CONSPIRACY

9. It was part of the conspiracy that defendant VINCENT WILLIAMS, a/k/a “Tate,” a/k/a “Taterhead,” [hereinafter VINCENT WILLIAMS], directed Tracey Saunders to act as a straw purchaser and buy firearms for him that he chose and had given her money to purchase on his behalf.

OVERT ACTS

In furtherance of the conspiracy, the following overt acts were committed within the Eastern District of Pennsylvania:

August 12, 2000

1. On or about August 12, 2000, defendant, VINCENT WILLIAMS asked Tracey Saunders to buy firearms for him.

2. On or about August 12, 2000, defendant VINCENT WILLIAMS and Tracey Saunders went to Miller’s to purchase a firearm for VINCENT WILLIAMS.

3. On or about August 12, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller’s, an Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A053796, with cash provided by defendant VINCENT WILLIAMS.

4. On or about August 12, 2000, at Miller’s, Tracey Saunders completed ATF Form 4473 in connection with the purchase of the Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A053796, falsely representing that she was the actual buyer of the firearm.

5. On or about August 12, 2000, upon leaving Miller’s, Tracey Saunders

gave to defendant VINCENT WILLIAMS the Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A053796, and defendant VINCENT WILLIAMS paid \$300.00 to Tracey Saunders for purchasing the firearm for him.

August 14, 2000

6. On or about August 14, 2000, defendant VINCENT WILLIAMS and Tracey Saunders went to Crane's to purchase a firearm for VINCENT WILLIAMS. At Crane's, defendant VINCENT WILLIAMS and Tracey Saunders looked at various firearms until defendant VINCENT WILLIAMS chose a firearm for Tracey Saunders to purchase for him.

7. On or about August 14, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Crane's, a Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335, with cash provided by defendant VINCENT WILLIAMS.

8. On or about August 14, 2000, at Crane's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of a Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335, falsely representing that she was the actual buyer of the firearm.

9. On or about August 14, 2000, upon leaving Crane's, Tracey Saunders gave to defendant VINCENT WILLIAMS the Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335, and defendant VINCENT WILLIAMS paid \$100.00 to Tracey Saunders for purchasing the firearm for him.

August 16, 2000

10. On or about August 16, 2000, at the direction of defendant VINCENT

WILLIAMS, Tracey Saunders purchased, at Miller's, an Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956, with cash provided by defendant VINCENT WILLIAMS.

11. On or about August 16, 2000, at Miller's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956, falsely representing that she was the actual buyer of the firearm.

12. On or about August 16, 2000, upon leaving Miller's, Tracey Saunders gave to defendant VINCENT WILLIAMS the Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956, and defendant VINCENT WILLIAMS paid \$100.00 to Tracey Saunders for purchasing the firearm for him.

September 6, 2000

13. On or about September 6, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller's, a Ruger forty caliber semi-automatic pistol, Model P944T, serial number 340-75277, with cash provided by defendant VINCENT WILLIAMS.

14. On or about September 6, 2000, at Miller's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Ruger forty caliber semi-automatic pistol, Model P944T, serial number 340-75277, falsely representing that she was the actual buyer of the firearm.

15. On or about September 6, 2000, upon leaving Miller's, Tracey Saunders gave to defendant VINCENT WILLIAMS the Ruger forty caliber semi-automatic pistol, Model

P944T, serial number 340-75277, and defendant VINCENT WILLIAMS paid Tracey Saunders \$100.00 for purchasing the firearm for him.

September 16, 2000

16. On or about September 16, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller's, a Ruger forty-five caliber semi-automatic pistol, Model P90T, serial number 661-80733, with cash provided by defendant VINCENT WILLIAMS.

17. On or about September 16, 2000, at Miller's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Ruger forty-five caliber semi-automatic pistol, Model P90T, serial number 661-80733, falsely representing that she was the actual buyer of the firearm.

18. On or about September 16, 2000, Tracey Saunders gave to defendant VINCENT WILLIAMS the Ruger forty-five caliber semi-automatic pistol, Model P90T, serial number 661-80733, and defendant VINCENT WILLIAMS paid \$100.00 to Tracey Saunders for purchasing the firearm for him.

September 19, 2000

19. On or about September 19, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller's, a Magnum Research forty-four caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310, with cash provided by defendant VINCENT WILLIAMS.

20. On or about September 19, 2000, at Miller's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Magnum Research forty-four caliber

semi-automatic pistol, Model Desert Eagle, serial number 95253310, falsely representing that she was the actual buyer of the firearm.

21. On or about September 19, 2000, upon leaving Miller's, Tracey Saunders gave to defendant VINCENT WILLIAMS the Magnum Research forty-four caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310, and defendant VINCENT WILLIAMS paid \$100.00 to Tracey Saunders for purchasing the firearm for him.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 12, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of, false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, an Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A053796, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 14, 2000, at Crum Lynne, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of, false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, a Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335, from a federally licensed firearms dealer, that is, Ken Crane Sporting Goods, 310 Sloan Street, Crum Lynne, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 16, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of, false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, an Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 6, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, a Ruger 40 caliber semi-automatic pistol, Model P944T, serial number 340-75277, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, a Ruger 45 caliber semi-automatic pistol, Model P90T, serial number 661-80733, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 19, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of, false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, a Magnum Research 44 caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"

knowingly murdered and willfully caused the murder of Tracey Saunders, as defined in 18 U.S.C. § 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought, with the intent to prevent her from testifying at an official proceeding, that is, her testimony against her co-defendant Vincent Williams at his trial, and to prevent communication by Tracey Saunders to a law enforcement officer or judge of the United States of information relating to the commission of a federal offense, that is, conspiracy to make false statements and the making of false statements as charged in Counts 1 through 7 of this Indictment.

All in violation of Title 18, United States Code, Sections 2 , 1111(a), and 1512(a)(1)(A) and (C), and 1512(a)(2)(A).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"

knowingly murdered and willfully caused the murder of Tracey Saunders as defined in 18 U.S.C. § 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought, with the intent to retaliate against her for providing to a law enforcement officer information relating to the commission or possible commission of a federal offense, that is, conspiracy to make false statements and the making of false statements as charged in Counts 1 through 7 of this Indictment.

All in violation of Title 18, United States Code, Sections 2, 1111(a), and 1513(a)(1)(B) and (2)(A).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, defendant

BRIAN ROGERS,
a/k/a "B,"

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the killing of a witness and retaliation against a witness as charged in Counts 8 and 9 of this Indictment, knowingly used and carried a firearm to commit murder, as defined in 18 U.S.C. § 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and (j)(1), and 1111(a).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

THE RACKETEERING VIOLATION

1. From in or about 1996, to in or about December 2002, in the Eastern District of Pennsylvania, defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"
ANDRE COOPER,
a/k/a "Dre,"
MARK ROGERS,
a/k/a "Black Mark,"
SHANE TAYLOR,
RASHEE GRANT,
a/k/a "Bae-Bae," and
DAMIR ROBERTS,
a/k/a "Dams,"

with others known and unknown to the grand jury, being persons employed by and associated with the "Boyle Street Boys," more fully described below, which was an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conducted and participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, that is, through the commission of Racketeering Acts 1 through 22 as set forth in Paragraph 19 below.

THE RACKETEERING ENTERPRISE

2. The criminal organization, which came to be known as the “Boyle Street Boys” [hereinafter referred to as “BSB”], was formed in or before approximately 1996 by the defendants JAMAIN WILLIAMS and VINCENT WILLIAMS, who are brothers. Thereafter, defendants JAMAIN WILLIAMS and VINCENT WILLIAMS recruited ANDRE COOPER, BRIAN ROGERS, his cousin MARK ROGERS, SHANE TAYLOR, RASHEE GRANT, DAMIR ROBERTS, A. R., a juvenile [now deceased], and others both known and unknown to the grand jury as additional members of the BSB enterprise to provide cocaine to purchasers as well as to other members of their enterprise. The six senior members of the BSB, JAMAIN WILLIAMS, VINCENT WILLIAMS, ANDRE COOPER, BRIAN ROGERS, MARK ROGERS, SHANE TAYLOR, came to be known as the “oldheads.” Those that acted at the “oldheads”’ direction, including RASHEE GRANT, DAMIR ROBERTS, A.R., and other both known and unknown to the grand jury, came to be known as the “youngboys.” JAMAIN WILLIAMS and VINCENT WILLIAMS and others under their direction and control began delivering quantities of BSBs’ cocaine at different locations in the Highland Gardens section of Chester, Pennsylvania, including, but not limited to, the 2700 block of Boyle Street, 2719 Smithers Street, the area in and around DeMarcos store. The BSB eventually took control of the drug sales in the 2700 block of Boyle Street, Chester, Pennsylvania.

3. The BSB, including its leadership, members, and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4) (hereinafter “the enterprise”), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of

achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

THE PURPOSES OF THE ENTERPRISE

4. The purposes of the enterprise included manufacturing and distributing cocaine, a Schedule II controlled substance, in the Highland Gardens section of Chester, Pennsylvania, collecting money from the distribution of cocaine, and, where necessary, using or threatening violence to sustain the enterprise and further its goals.

MANNER AND MEANS OF THE ENTERPRISE

5. Members of the enterprise used different locations within the Highland Gardens section of Chester, Pennsylvania, to store, package, and sell their cocaine, including, but not limited to, 2719 Smithers Street and 2702 Boyle Street.

6. Members of the enterprise routinely used physical violence and threats of violence to: (a) discipline and maintain control over the enterprise's workers, (b) keep members of the enterprise and others from cooperating with law enforcement authorities, or providing law enforcement authorities with any information or testimony against members of the enterprise, (c) deter and eliminate competition from other drug dealers, and (d) maintain their position of power and status in the area in which they dealt drugs.

7. To further their objectives of physical violence and threats, members of the enterprise routinely carried loaded firearms, had firearms available at hidden locations, and wore protective bulletproof vests.

8. To have firearms available for themselves and others in their enterprise, defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, BRIAN ROGERS, and ANDRE

COOPER used other persons to “straw purchase” firearms, that is, the other person would purchase a firearm in his or her name intending to later illegally resell or give the firearms to defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, BRIAN ROGERS, or ANDRE COOPER. One of the persons who the members of the enterprise paid to straw purchase firearms for the enterprise was Tracey Saunders.

9. To protect the enterprise, the members used violence to intimidate and silence potential witnesses. When members of the enterprise became concerned that a person may testify against them, members of the enterprise would commit acts of violence, including murder, to silence those persons.

10. To protect the reputation of the enterprise and to ensure the continued status and stature of the enterprise in the neighborhood, the members used violence to demonstrate their power. When members of the enterprise became concerned that a person may not be showing them proper respect, members of the enterprise would commit acts of violence, including murder, to insure their continued status and position of power in the area where the enterprise dealt drugs.

ROLES OF THE DEFENDANTS

The defendants participated in the operation and management of the enterprise.

11. The defendant JAMAIN WILLIAMS organized, controlled, and supervised the operation of the enterprise. On numerous occasions between 1996 and 2002, JAMAIN WILLIAMS participated in the possession with the intent to distribute and the distribution of cocaine. JAMAIN WILLIAMS usually carried a firearm and frequently wore a bulletproof vest. JAMAIN WILLIAMS recruited numerous persons to join the enterprise.

12. The defendant VINCENT WILLIAMS organized, controlled, and supervised the operation of the enterprise. On numerous occasions between 1996 and 2002, VINCENT WILLIAMS participated in the possession with the intent to distribute and the distribution of cocaine. VINCENT WILLIAMS usually carried a firearm and frequently wore a bulletproof vest, and conspired to murder Tracey Saunders.

13. The defendant ANDRE COOPER participated in the possession with the intent to distribute and the distribution of cocaine on numerous occasions between 1996 and 2002. ANDRE COOPER also acted as an enforcer, armed with various loaded handguns, to guard the corner of Boyle and Culhane Streets and other locations where cocaine was being sold by members of the enterprise as well as the “stash” locations where the cocaine was packaged and stored until needed for distribution by the enterprise. ANDRE COOPER usually carried a firearm and frequently wore a bulletproof vest.

14. The defendant BRIAN ROGERS participated in the possession with the intent to distribute and the distribution of cocaine on numerous occasions between 1996 and 2002. BRIAN ROGERS also acted as an enforcer, armed with various loaded handguns, to guard the corner of Boyle and Culhane Streets and other locations where cocaine was being sold by members of the enterprise as well as the “stash” locations where the cocaine was packaged and stored until needed for distribution by the enterprise. BRIAN ROGERS usually carried a firearm, frequently wore a bulletproof vest, and murdered Tracey Saunders.

15. The defendant MARK ROGERS was a member of the enterprise who, among other duties, at various times between 1996 and 2002 possessed with the intent to distribute cocaine, delivered cocaine, and picked up proceeds from the distribution of cocaine. MARK

ROGERS usually carried a firearm and frequently wore a bulletproof vest.

16. The defendant SHANE TAYLOR was a member of the enterprise who, among other duties, at various times between 1996 and 2002 possessed with the intent to distribute cocaine, delivered cocaine, and picked up proceeds from the distribution of cocaine. SHANE TAYLOR usually carried a firearm.

17. The defendant RASHEE GRANT was a member of the enterprise who conducted street level drug sales and acted as a “lookout,” watching for the presence of police officers and other agents of law enforcement while drug sales were ongoing, among other duties performed for the enterprise. RASHEE GRANT usually had access to a firearm.

18. The defendant DAMIR ROBERTS was a member of the enterprise who conducted street level drug sales and acted as a “lookout,” watching for the presence of police officers and other agents of law enforcement while drug sales were ongoing, among other duties performed for the enterprise. DAMIR ROBERTS usually had access to a firearm.

PATTERN OF RACKETEERING ACTIVITY

19. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5) consisted of the following acts:

RACKETEERING ACT NO. 1

From in or about 1996, to in or about December 2002, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a “Tate,”
a/k/a “Taterhead,”
BRIAN ROGERS,
a/k/a “B,”

JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"
ANDRE COOPER,
a/k/a "Dre,"
MARK ROGERS,
a/k/a "Black Mark,"
SHANE TAYLOR,
RASHEE GRANT,
a/k/a "Bae-Bae," and
DAMIR ROBERTS,
a/k/a "Dams,"

conspired and agreed with others known and unknown to the grand jury, to knowingly and intentionally manufacture and distribute more than 5 kilograms of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

RACKETEERING ACT NO. 2

On or about October 9, 1997, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally possessed with the intent to distribute sixteen packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 3

On or about December 1, 1997, at Chester, Delaware County, in the Eastern

District of Pennsylvania, the defendant

MARK ROGERS,
a/k/a "Black Mark,"

knowingly and intentionally possessed with the intent to distribute sixteen packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 4

On or about January 17, 1998, at Chester, Delaware County, in the Eastern

District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead," and
JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"

knowingly and intentionally possessed with the intent to distribute a substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 5

On or about May 11, 1998, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed, and aided and abetted the distribution of, a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled

substance, in violation of Title 21, United States Code, Sections 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT NO. 6

On or about March 2, 1999, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"

knowingly and intentionally possessed with the intent to distribute four packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 7

On or about January 8, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
MARK ROGERS,
a/k/a "Black Mark,"

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with the intent to distribute of, approximately 137 packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT NO. 8

On or about April 22, 2000, at Chester, Delaware County, in the Eastern District

of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"

committed an act involving murder, that is, knowingly and intentionally killed Randolph Harris, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2502.

RACKETEERING ACT NO. 9

On or about October 9, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally possessed with the intent to distribute one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 10

On or about July 11, 2001, at Linwood, in the Eastern District of Pennsylvania, the defendant

BRIAN ROGERS,
a/k/a "B,"

knowingly and intentionally possessed with the intent to distribute one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 11

At Chester, Delaware County, in the Eastern District of Pennsylvania, the
defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead," and
BRIAN ROGERS,
a/k/a "B,"

committed the following acts involving murder, any one of which alone constitutes Racketeering
Act 11:

(a) From in or about early 2001 to in or about October 8, 2001, the
defendants VINCENT WILLIAMS and BRIAN ROGERS did commit an act involving murder,
that is, with the intent of promoting and facilitating the commission of the crime of murder, did
agree with one another to murder Tracey Saunders and did commit an overt act in pursuance
thereof, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and
2502.

(b) On or about October 8, 2001, the defendants VINCENT WILLIAMS
and BRIAN ROGERS knowingly and intentionally killed, and with the intent to promote or
facilitate, aided, agreed or attempted to aid, and solicited another to commit, the killing of, Tracey
Saunders, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502
and 306.

RACKETEERING ACT NO. 12

On or about June 12, 2002, at Chester, Delaware County, in the Eastern District of

Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally possessed with the intent to distribute three packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 13

On or about July 8, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 14

In or about the summer of 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"

knowingly used intimidation and physical threat, threatened, and corruptly persuaded, and attempted to do so, and engaged in misleading conduct toward another person with the intent to influence and prevent the testimony of a person in an official proceeding, and with the intent to

cause and induce a person to withhold testimony from an official proceeding, against Brian ROGERS, in violation of Title 18, United States Code, Section 1512(b)(1) and (2).

RACKETEERING ACT NO. 15

On or about August 26, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed two packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 16

On or about August 29, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed two packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 17

On or about September 5, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 18

On or about September 23, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 19

On or about October 7, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

RASHEE GRANT,
a/k/a "Bae-Bae,"

committed the following acts, any one of which alone constitutes Racketeering Act 19:

(a) Knowingly and intentionally distributed five packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(b) knowingly and intentionally distributed one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 20

On or about October 23, 2002, at Chester, Delaware County, in the Eastern
District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally distributed a packet of a mixture or substance containing a detectable
amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States
Code, Section 841(a)(1).

RACKETEERING ACT NO. 21

On or about October 29, 2002, at Chester, Delaware County, in the Eastern
District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
SHANE TAYLOR

knowingly and intentionally distributed, and did aid and abet the distribution of, one packet of a
mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United
States Code, Section 2.

RACKETEERING ACT NO. 22

On or about November 13, 2002, at Chester, Delaware County, in the Eastern
District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed one packet of a mixture or substance containing a

detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1962(c).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this Indictment, the BSB, as more fully described in Paragraphs 2 through 18 of Count Eleven of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely the BSB, that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

3. On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead," and
BRIAN ROGERS,
a/k/a "B,"

for the purpose of maintaining and increasing their positions in the Boyle Street Boys drug organization, and aiding and abetting the maintaining and increasing of the positions of others in the Boyle Street Boys drug organization, an enterprise engaged in racketeering activity, knowingly and intentionally murdered, knowingly aided and abetted, and willfully caused the murder of, and with the intent to promote or facilitate, aided, agreed or attempted to aid, and

solicited another to commit, the murder of, Tracey Saunders, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502(a) and 306.

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Twelve of this Indictment are incorporated here.
2. On or about April 22, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, defendant

JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"

for the purpose of maintaining and increasing his position in the Boyle Street Boys drug organization, and aiding and abetting the maintaining and increasing of the positions of others in the Boyle Street Boys drug organization, an enterprise engaged in racketeering activity, knowingly and intentionally murdered, knowingly aided and abetted, and willfully caused the murder of Randolph Harris, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2502(a).

In violation of Title 18, United States Code, Section 1959(a)(1).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the killing of Randolph Harris as charged in Count 13 of this Indictment, knowingly used and carried a firearm to commit murder, as defined in 18 U.S.C. § 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and (j)(1), and 1111(a).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about the summer of 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"

knowingly used intimidation and physical threat, threatened, and corruptly persuaded, and attempted to do so, and engaged in misleading conduct toward another person with the intent to influence and prevent the testimony of a person in an official proceeding, and with the intent to cause and induce a person to withhold testimony from an official proceeding, against BRIAN ROGERS.

In violation of Title 18, United States Code, Section 1512(b)(1) and (2).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about 1996 to in or about January 2002, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"
ANDRE COOPER,
a/k/a "Dre,"
MARK ROGERS,
a/k/a "Black Mark,"
SHANE TAYLOR,
RASHEE GRANT,
a/k/a "Bae-Bae,"
DAMIR ROBERTS,
a/k/a "Dams,"
GEORGE DORSEY, and
CHARLENE RESTUCCI

conspired and agreed with others known and unknown to the grand jury to knowingly and intentionally distribute more than 5 kilograms of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that the defendants:

2. Operated a drug organization, which came to be known as the Boyle Street Boys

["BSB"] drug organization, the purpose of which was to distribute cocaine, a Schedule II controlled substance [hereinafter simply referred to as "cocaine"], in the Highland Gardens section of Chester, Pennsylvania.

3. Hid cocaine which they sold to customers who came to the Boyle Street area of Highland Gardens to purchase cocaine at various "stash" locations, including near the corner of Boyle and Culhane Streets, in order to avoid having drugs on their person in the event police were in the area.

4. Used various locations to store and package the cocaine, including 2702 Boyle Street and 2719 Smithers Street, both in Highland Gardens, Chester, Pennsylvania.

5. Utilized violence or the threat of violence to discipline and maintain control over the organization's workers.

6. Utilized violence or the threat of violence to keep members of the organization or others from cooperating with law enforcement authorities, or providing law enforcement authorities with any information or testimony against members of the organization.

7. Utilized violence or the threat of violence to deter and eliminate competition from other drug dealers as well as maintain their position of power and status in the area in which they dealt drugs.

8. Utilized juveniles to sell the BSB cocaine.

9. Carried loaded firearms, had firearms available at hidden locations, and wore protective bulletproof vests to protect themselves against possible attack by rival drug dealers.

10. Utilized other persons to "straw purchase" firearms, that is, the other person would purchase a firearm in his or her name intending to later illegally resell the firearms to the

defendants, in order to have a steady supply of firearms for the members of the organization.

MEMBERS OF THE CONSPIRACY

11. Paragraphs 12 through 19 of Count Eleven are realleged here.

12. Defendants GEORGE DORSEY [hereinafter DORSEY] and CHARLENE RESTUCCI [hereinafter RESTUCCI] knowingly maintained the premises at 2719 Smithers Street, Highland Gardens, Chester, Pennsylvania, for the purpose of manufacturing, storing and distributing cocaine, a Schedule II controlled substance and knowingly participated in the distribution of cocaine, a Schedule II controlled substance, on behalf of the organization.

OVERT ACTS

In furtherance of the conspiracy, and in order to accomplish its objects, the following overt acts, among others, were performed by the defendants in Chester, Delaware County, in the Eastern District of Pennsylvania and elsewhere:

12. In or about 1996, defendants JAMAIN WILLIAMS and VINCENT WILLIAMS began distributing cocaine in the area of Boyle and Culhane Streets in the Highland Gardens section of Chester, Pennsylvania.

13. On various occasions between 1996 and 2002, defendant JAMAIN WILLIAMS possessed with the intent to distribute cocaine, distributed cocaine, and received the proceeds from the distribution of cocaine.

14. On various occasions between 1996 and 2002, defendant VINCENT WILLIAMS possessed with the intent to distribute cocaine, distributed cocaine, and received the proceeds from the distribution of cocaine.

15. On various occasions between 1996 and 2002, defendant BRIAN ROGERS

possessed with the intent to distribute cocaine, distributed cocaine, and received the proceeds from the distribution of cocaine.

16. On various occasions between 1996 and 2002, defendant ANDRE COOPER possessed with the intent to distribute cocaine and distributed cocaine.

17. On various occasions between 1996 and 2002, defendant MARK ROGERS possessed with the intent to distribute cocaine and distributed cocaine.

18. On various occasions between 1996 and 2002, defendant SHANE TAYLOR possessed with the intent to distribute cocaine and distributed cocaine.

19. On various occasions between 1996 and 2002, defendant RASHEE GRANT possessed with the intent to distribute cocaine and distributed cocaine.

20. On various occasions between 1996 and 2002, defendant DAMIR ROBERTS possessed with the intent to distribute cocaine and distributed cocaine.

21. On various occasions between 1996 and 2000, prior to his murder, juvenile A.R. possessed with the intent to distribute cocaine and distributed cocaine.

22. From in or about 1996 through in or about 2002, defendants JAMAIN WILLIAMS, VINCENT WILLIAMS, BRIAN ROGERS, ANDRE COOPER, MARK ROGERS, SHANE TAYLOR, RASHEE GRANT, DAMIR ROBERTS, and others known and unknown to the grand jury, stored cocaine in “stash” or hiding spots. One location used for “stash” was the yard of 1214 Culhane Street in Chester, including, but not limited to, the clothesline bag, under the picnic table, near the fence line, and in the trash cans of 1214 Culhane Street. Another location used for “stash” was an abandoned house located at the intersection of Culhane and Boyle Streets in Chester.

23. From in or about 1996 through in or about 2002, defendants JAMAIN WILLIAMS, VINCENT WILLIAMS, BRIAN ROGERS, ANDRE COOPER, MARK ROGERS, and SHANE TAYLOR utilized juveniles to sell BSB cocaine.

24. On or about October 9, 1997, at Swartz and Culhane Streets in Chester, defendant SHANE TAYLOR possessed with the intent to distribute 16 packets of cocaine and \$75.

25. On or about December 1, 1997, at 2712 Boyle Street in Chester, defendant MARK ROGERS possessed with the intent to distribute 16 packets of cocaine and \$238.

26. On or about January 17, 1998, at 2726 Boyle Street in Chester, defendants JAMAIN WILLIAMS and VINCENT WILLIAMS possessed with the intent to distribute a packet of cocaine, approximately \$1,000 cash, a Harrington and Richardson .32 caliber revolver, serial number AS28430, and drug packaging paraphernalia, including dozens of new empty ziplock baggies used for packaging cocaine, razors used for packaging and separating cocaine, and inositol, a substance used to “cut,” that is, a filler used increase the overall bulk weight of, cocaine.

27. On or about May 11, 1998, at Boyle and Culhane Streets in Chester, defendant SHANE TAYLOR provided a packet of cocaine to a person who in turn sold that packet of cocaine to an undercover police officer for \$100.

28. On or about March 2, 1999, at 2626 Boyle Street in Chester, defendant JAMAIN WILLIAMS possessed with the intent to distribute four packets of cocaine and \$820.

29. On or about March 2, 1999, at 2703 Boyle Street in Chester, defendant JAMAIN WILLIAMS threatened to injure a person known to the grand jury who told him to move from in front of 2703 Boyle Street where defendant JAMAIN WILLIAMS was selling cocaine.

30. From in or about 1999 to in or about 2001, defendants JAMAIN WILLIAMS, VINCENT WILLIAMS, BRIAN ROGERS, ANDRE COOPER, MARK ROGERS, and SHANE TAYLOR used the location of 2702 Boyle Street in Chester to store cocaine as well as firearms used by the defendants in their cocaine distribution.

31. On or about January 8, 2000, at Boyle and Culhane Streets in Chester, defendants MARK ROGERS and ANDRE COOPER, both wearing bullet proof vests, possessed with the intent to distribute 137 packets of cocaine, along with three firearms, a loaded Colt .45 caliber semi-automatic pistol, serial number 1708-M2, a loaded Colt .45 caliber semi-automatic pistol, serial number 555954, and a Rossi .38 caliber revolver, serial number 82565.

32. On or about April 22, 2000, to maintain his position of power and status in the area in which he dealt drugs, defendant JAMAIN WILLIAMS shot and killed Randolph Harris outside DeMarcos store in Highland Gardens, Chester.

33. In or about April of 2000, defendants DAMIR ROBERTS and RASHEE GRANT, and others known to the grand jury, attacked and beat A.R., a juvenile, at the direction of defendants JAMAIN WILLIAMS and BRIAN ROGERS, because JAMAIN WILLIAMS and BRIAN ROGERS believed that A.R. was a “snitch,” that is, someone who was informing on their drug organization to law enforcement.

34. In or about May 2000, after the discovery of A.R.’s body in Fairmont Park in Philadelphia where he was found shot to death, defendants BRIAN ROGERS and RASHEE GRANT warned others that that was what happened to someone who “snitched” on their drug organization.

35. In or about May 2000, after the police began investigating the murder of A.R., defendants JAMAIN WILLIAMS, VINCENT WILLIAMS and BRIAN ROGERS threatened a person known to the grand jury, a friend of A.R.'s, telling the friend of A.R.'s not to speak to the police.

36. From in or about 2000 through 2002, defendants DORSEY and RESTUCCI maintained the premises at 2719 Smithers Street, Highland Gardens, Chester, Pennsylvania, for the purpose of manufacturing, storing and distributing cocaine for the BSB.

37. From in or about 2000 through 2002, defendants DORSEY and RESTUCCI sold cocaine on behalf of the BSB organization run by defendants JAMAIN WILLIAMS and VINCENT WILLIAMS.

38. From in or about 2000 through in or about 2002, defendants JAMAIN WILLIAMS, VINCENT WILLIAMS, ANDRE COOPER, SHANE TAYLOR, RASHEE GRANT, and DAMIR ROBERTS used 2719 Smithers in Chester as a location to distribute, manufacture, and store BSB cocaine.

39. On or about October 9, 2000, at 2702 Boyle Street in Chester, defendant VINCENT WILLIAMS, wearing a bulletproof vest, possessed a loaded firearm, a Desert Eagle .44 caliber semi-automatic pistol, serial number 95253310 (which was later determined to have been purchased by Tracey Saunders on September 19, 2000), along with an additional magazine loaded with ammunition.

40. On or about October 9, 2000, at 2702 Boyle Street in Chester, defendant ANDRE COOPER, wearing a bulletproof vest, possessed a loaded firearm, a Ruger .40 caliber semi-automatic pistol, serial number 340-75277 (which was later determined to have been

purchased by Tracey Saunders on September 6, 2000), and possessed with the intent to distribute a packet of cocaine and \$120.

41. In or about the fall of 2000, defendant BRIAN ROGERS agreed to pay a person known to the grand jury \$450 per firearm for the person known to the grand jury to purchase new 9 mm. semi-automatic firearms for BRIAN ROGERS.

42. In or about the fall of 2000, a day after the overt act in paragraph #30, defendant VINCENT WILLIAMS paid \$450 to a person known to the grand jury for one of the new 9 mm. semi-automatic firearms ordered by defendant BRIAN ROGERS.

43. In or about the fall of 2000, a few days after the overt act in paragraph #30, defendant BRIAN ROGERS paid \$450 to a person known to the grand jury for a new 9 mm. semi-automatic firearm.

44. In or about the fall of 2000, a few days after the overt act in paragraph #30, defendant ANDRE COOPER paid \$450 to a person known to the grand jury for one of the new 9 mm. semi-automatic firearms ordered by defendant BRIAN ROGERS.

45. In or about the summer of 2001, defendant JAMAIN WILLIAMS threatened Tracey Saunders about talking to police, telling Tracey Saunders to “mind her business,” and that talking was “how people get hurt.”

46. In or about the summer of 2001, defendant JAMAIN WILLIAMS told a person known to the grand jury to give Tracey Saunders a message that Tracey Saunders should watch what she says and keep his name out of it.

47. On or about July 11, 2001, defendant BRIAN ROGERS possessed with the intent to distribute one packet (an “eightball”) of cocaine, which BRIAN ROGERS had agreed to sell to

an undercover agent.

48. On or about August 1, 2001, at 2719 Smithers Street in Chester, defendant DORSEY distributed two packets of cocaine to an undercover agent for \$40.

49. On or about August 2, 2001, at Boyle and Culhane Streets in Chester, defendant JAMAIN WILLIAMS possessed with the intent to distribute six packets of a white powder that field-tested positive for the presence of cocaine.

50. On or about August 28, 2001, at 2719 Smithers Street in Chester, defendants DORSEY and RESTUCCI distributed two packets of cocaine to an undercover agent for \$80.

51. In or about October 2001, defendant and VINCENT WILLIAMS ordered the murder of Tracey Saunders, who defendant VINCENT WILLIAMS feared would “snitch,” that is provide information to law enforcement, following Saunders’ arrest for straw purchasing firearms, to include the Desert Eagle .44 caliber semi-automatic pistol seized from defendant VINCENT WILLIAMS and the Ruger .40 caliber semi-automatic pistol seized from ANDRE COOPER on October 9, 2000.

52. On or about October 8, 2001, defendant BRIAN ROGERS shot and killed Tracey Saunders by shooting her twice in the head at point-blank range because defendants JAMAIN WILLIAMS and VINCENT WILLIAMS feared Tracey Saunders would provide information to law enforcement authorities about their cocaine organization.

53. In or about spring of 2002, defendant JAMAIN WILLIAMS asked a person known to the grand jury to find an eyewitness to defendant BRIAN ROGERS’ murder of Tracey Saunders and tell the eyewitness to change the eyewitness’ testimony.

54. On or about June 12, 2002, at 2703 Smithers Street in Chester, defendant

DAMIR ROBERTS possessed with the intent to distribute three packets of cocaine.

55. On or about July 8, 2002, at 2719 Smithers Street in Chester, defendant DAMIR ROBERTS distributed one packet of cocaine to an undercover agent for \$160.

56. On or about August 26, 2002, at 2719 Smithers Street in Chester, defendant DAMIR ROBERTS distributed two packets of cocaine to an undercover agent for \$300.

57. On or about August 29, 2002, at 2719 Smithers Street in Chester, defendant DAMIR ROBERTS distributed two packets of cocaine to an undercover agent for \$300.

58. On or about September 5, 2002, at 2719 Smithers Street in Chester, defendant DAMIR ROBERTS distributed one packet of cocaine to an undercover agent for \$480.

59. On or about September 23, 2002, at 2719 Smithers Street in Chester, defendant SHANE TAYLOR distributed one packet of cocaine to an undercover agent for \$250.

60. On or about September 26, 2002, at 2719 Smithers Street in Chester, defendant RASHEE GRANT agreed to distributed two “eightballs” (that is, approximately 7 grams of cocaine) to an undercover agent for \$300.

61. On or about October 7, 2002, at 2719 Smithers Street in Chester, defendant RASHEE GRANT distributed five packets of cocaine to an undercover agent for \$60.

62. On or about October 7, 2002, at 2719 Smithers Street in Chester, defendant RASHEE GRANT distributed one packet of cocaine to an undercover agent for \$180.

63. On or about October 23, 2002, at 2719 Smithers Street in Chester, defendant ANDRE COOPER distributed one packet of cocaine to an undercover agent for \$300.

64. On or about October 29, 2002, at 2719 Smithers Street in Chester, defendants ANDRE COOPER and SHANE TAYLOR distributed one packet of cocaine to an undercover agent for \$275.

65. On or about November 13, 2002, at 2719 Smithers Street in Chester, defendant SHANE TAYLOR distributed one packet of cocaine to an undercover agent for \$450.

All in violation of Title 21, United States Code, Section 846.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

From in or about 2000 through in or about October 2001, at Chester, Delaware County,
in the Eastern District of Pennsylvania, the defendants

GEORGE DORSEY and
CHARLENE RESTUCCI

knowingly maintained the premises at 2719 Smithers Street, Highland Gardens, Chester,
Pennsylvania, for the purpose of manufacturing, storing and distributing cocaine, a Schedule II
controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 11, 1998, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed, and aided and abetted the distribution of, a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 2, 1999, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "Jarmaine,"
a/k/a "Jay,"
a/k/a "Maine,"

knowingly and intentionally possessed with the intent to distribute four packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
MARK ROGERS,
a/k/a "Black Mark,"

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with the intent to distribute of, approximately 137 packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, weighing approximately 58 grams.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
MARK ROGERS,
a/k/a "Black Mark,"

knowingly possessed, and aided and abetted the possession of, firearms, that is, a loaded Colt .45 caliber semi-automatic pistol, serial number 1708-M2, a loaded Colt .45 caliber semi-automatic pistol, serial number 555954, and a Rossi .38 caliber revolver, serial number 82565, in furtherance of a drug trafficking crime, for which each may be prosecuted in a court of the United States, that is, the possession with the intent to distribute cocaine, as charged in Count Twenty of this Indictment and conspiracy to distribute cocaine, as charged in Count Sixteen.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally possessed with the intent to distribute a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly used and carried a firearm, that is, a loaded Ruger .40 caliber semi-automatic pistol, serial number 340-75277, during and in relation to a drug trafficking crime, for which each may be prosecuted in a court of the United States, that is, the possession with the intent to distribute cocaine, as charged in Count Twenty-Two of this Indictment and conspiracy to distribute cocaine, as charged in Count Sixteen.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 11, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

BRIAN ROGERS,
a/k/a "B,"

knowingly and intentionally distributed a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally possessed with the intent to distribute three packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 8, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 1.4 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 26, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed two packets of a mixture or substance weighing approximately 3.9 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 29, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed two packets of a mixture or substance weighing approximately 5.7 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 5, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 12.0 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 23, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 6.9 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

RASHEE GRANT,
a/k/a "Bae-Bae,"

knowingly and intentionally distributed five packets of a mixture or substance weighing approximately 1.1 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

RASHEE GRANT,
a/k/a “Bae-Bae,”

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 3.0 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 7.3 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
SHANE TAYLOR

knowingly and intentionally distributed, and aided and abetted the distribution of, a packet of a mixture or substance weighing approximately 3.8 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 13, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 14.9 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 371, 924(a)(1)(A), and 2 set forth in Counts One through Seven of this indictment, the defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28 United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (a) An Intratec nine millimeter semiautomatic pistol, Model AB10, serial number A053796;
- (b) A Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335;
- (c) An Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956;
- (d) A Ruger forty caliber semi-automatic pistol, Model P944T, serial number 340-75277;
- (e) A Ruger forty-five caliber semi-automatic pistol, Model P90T, serial number 661-80733; and
- (f) A Magnum Research forty-four caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

NOTICE OF SPECIAL FINDINGS

THE GRAND JURY FURTHER FINDS THAT:

1. As to Counts Eight, Nine, and Twelve, defendant VINCENT WILLIAMS:
 - a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and that Tracey Saunders died as a direct result of that act [Title 18, United States Code, Section 3591(a)(2)(C)];
 - c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Tracey Saunders died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)]; and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person [Title 18, United States Code, Section 3592(c)(9)].

2. As to Counts Eight, Nine, Ten, and Twelve, defendant BRIAN ROGERS:
- a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally killed Tracey Saunders [Title 18, United States Code, Section 3591(a)(2)(A)];
 - c. Intentionally inflicted serious bodily injury that resulted in the death of Tracey Saunders [Title 18, United States Code, Section 3591(a)(2)(B)];and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person [Title 18, United States Code, Section 3592(c)(9)].

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney